

1 Hon. Richard A. Jones
2
3
4

5 UNITED STATES DISTRICT COURT
6 WESTERN DISTRICT OF WASHINGTON
7 AT SEATTLE

8 MEGAN MING FRANCIS, et al.,

9 Plaintiffs,

v.

10 UNITED STATES DEPARTMENT OF
11 JUSTICE,
12 Defendant.

No. 2:19-cv-1317-RAJ

**JOINT MOTION FOR
EXTENSION OF TIME TO
FILE JOINT STATUS
REPORT**

13
14
15
16
17
18
19
20
21
22
JOINT MOTION FOR EXTENSION OF TIME
TO FILE JOINT STATUS REPORT– Page 1
Megan Ming Francis, et al. v. Dep’t of Justice, 2:19-cv-1317-RAJ

Alex Abdo (*pro hac vice*)
Knight First Amendment Institute
at Columbia University
475 Riverside Drive, Suite 302
New York, NY 10115
(646)745-8500
alex.abdo@knightcolumbia.org

1 Plaintiffs Megan Ming Francis, Matthew J. Connelly, Mary L. Dudziak, Matthew L.
2 Jones, Hiroshi Motomura, Campaign for Accountability, and the Knight First Amendment
3 Institute at Columbia University (collectively, “Plaintiffs”) and Defendant United States
4 Department of Justice (“Defendant”), jointly move for a seven-day extension of time to submit
5 the parties’ Fourth Joint Status Report to the Court.

6 On August 11, 2020, this Court issued an Amended Scheduling Order setting November
7 6, 2020 as the deadline for the parties’ Fourth Joint Status Report. *See* ECF No. 21. As described
8 in the parties’ Third Joint Status Report, *see* ECF No. 20 at 4, the parties have been engaged in
9 negotiations over the continued production of records responsive to Plaintiffs’ request and
10 whether Plaintiffs will narrow their request. The parties met and conferred telephonically on
11 October 27, 2020 and are diligently continuing to discuss proposals to narrow Plaintiffs’ request
12 and ensure the efficient production of records in this case. To that end, the parties request a brief
13 continuance of the deadline to file the parties’ Fourth Joint Status Report from November 6,
14 2020 to November 13, 2020.

15
16 DATED: November 3, 2020

Respectfully submitted,

17
18 /s/ Alex Abdo
19 _____
20 Alex Abdo, *Pro Hac Vice*
21 Jameel Jaffer, *Pro Hac Vice*
22 Knight First Amendment Institute at Columbia
University
475 Riverside Drive, Suite 302
New York, NY 10115
(646) 745-8500
alex.abdo@knightcolumbia.org

JOINT MOTION FOR EXTENSION OF TIME
TO FILE JOINT STATUS REPORT– Page 2
Megan Ming Francis, et al. v. Dep’t of Justice, 2:19-cv-1317-RAJ

Alex Abdo (*pro hac vice*)
Knight First Amendment Institute
at Columbia University
475 Riverside Drive, Suite 302
New York, NY 10115
(646)745-8500
alex.abdo@knightcolumbia.org

/s/ Katherine George
Katherine George (WSBA 36288)
Johnston George LLP
2101 4th Ave., Suite 860
Seattle, WA 98121
(206) 832-1820
kathy@johnstongeorge.com

Attorneys for Plaintiffs

ETHAN P. DAVIS
Acting Assistant Attorney General
Civil Division

MARCIABERMAN
Assistant Branch Director
Federal Programs Branch

/s/ Rebecca Cutri-Kohart
REBECCA CUTRI-KOHART
DC Bar No. 1049030
Trial Attorney
U.S. Department of Justice
Civil Division, Federal Programs Branch
1100 L Street NW
Washington, DC 20530
(202) 514-0265 (telephone)
(202) 616-8460 (facsimile)
rebecca.cutri-kohart@usdoj.gov

Attorneys for Defendant

**JOINT MOTION FOR EXTENSION OF TIME
TO FILE JOINT STATUS REPORT– Page 3**

Alex Abdo (*pro hac vice*)
Knight First Amendment Institute
at Columbia University
475 Riverside Drive, Suite 302
New York, NY 10115
(646)745-8500
alex.abdo@knightcolumbia.org